

# EXHIBIT E

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

BLAKE LIVELY,

Movant,

v.

No. 3:25-mc-63-L

THE SKYLINE AGENCY LLC and ROZA  
KALANTARI,

Respondents.

**MOTION TO SHORTEN TIME TO RESPOND  
TO MOTIONS TO COMPEL AND TO TRANSFER  
AND BRIEF IN SUPPORT**

Movant Blake Lively hereby moves to shorten the period of time in which to file any response and brief in opposition to the Motion to Compel (Dkt. No. 1) and the Motion to Transfer (Dkt. No. 4) under Local Civil Rule 7.1(e) to **August 12, 2025**. This Motion is made on the following grounds:

1. The Motion to Compel relates to subpoenas issued from the Southern District of New York in Case No. 24-cv-10049, *Lively v. Wayfarer Studios LLC, et al.* Discovery in that action is set to close on September 30, 2025. In the interest of avoiding conflicting rulings, preserving judicial economy, and ensuring that the issuing Court can continue to manage the complex and compressed discovery schedule in that case, the Motion to Transfer also seeks transfer back to the issuing Court under Federal Rule of Civil Procedure 45(f).
2. Under Local Rule 7.1(e), any response and brief in opposition to the Motion to Compel and Motion to Transfer would not be due for 21 days, meaning that—at the earliest—the Motion to Transfer would not be ripe for decision (other than *sua sponte*) until the end of

August. And, whether or not the Motion to Transfer is granted, the Motion to Compel would not be decided until late August or early September *at the earliest*, potentially delaying resolution of this dispute until the last weeks or even days of fact discovery. As explained further in the accompanying Brief, more expedited resolution of these Motions is appropriate, particularly the Motion to Transfer.

This Motion is based on Ms. Lively's concurrently filed brief; all pleadings, records, and filings in the above-captioned case; all matters of which the Court shall take judicial notice; and on such argument as may be presented at any hearing on this Motion.

**BRIEF IN SUPPORT OF MOTION TO SHORTEN TIME  
TO RESPOND TO MOTIONS TO COMPEL AND TO TRANSFER**

For many of the same reasons that transfer to the Southern District of New York is appropriate here, *see* Dkt. No. 5, the Court should shorten the time in which to respond to the pending Motion to Compel and Motion to Transfer. The underlying Motion to Compel relates to subpoenas issued from the Southern District of New York in connection with a pending civil action there (the "SDNY Litigation"). Discovery in the SDNY Litigation is proceeding on a highly compressed timetable, with a deadline for all fact discovery and depositions to be complete by September 30, 2025. SDNY Dkt. No. 425. Both the discovery sought in the Motion to Compel and the legal issues raised in that Motion are important to the progress of that discovery schedule. The Skyline Parties' withheld documents may shed light on numerous issues relating to the ongoing retaliatory campaign against Ms. Lively—and on its origins in August 2024, when discovery has already shown that Ms. Kalantari was in contact with some of the defendants in the SDNY Litigation. And, the privilege issues raised in the Motion to Compel relate to similar issues that have been (or will shortly be) raised in the SDNY Litigation, where discovery disputes are required to proceed on an expedited schedule. *See* SDNY Dkt. Nos. 548, 549 (setting August 6, 2025

deadline to oppose Ms. Lively's August 4, 2025 motion to compel, which raised attorney-client privilege issues among other things); *see* Rule 4(C), Hon Lewis J. Liman's Individual Rules and Practices in Civil Cases (Apr. 7, 2025) (requiring responses to motions to compel discovery within two business days).<sup>1</sup>

Here, adhering to Local Rule 7.1(e)'s default 21-day response period would unnecessarily delay resolution of the Motion to Compel. Even more so, it would unnecessarily delay resolution of the Motion to Transfer, which could potentially obviate the need for the Court even to consider the Motion to Compel. Where special circumstances weigh in favor of an expedited briefing schedule, this Court frequently exercises its discretion to modify and shorten the response period provided in Local Civil Rule 7.1(e). *See, e.g., U.S. Commodity Futures Trading Comm'n v. TMTE, Inc.*, No. 3:20-CV-2910-L, 2021 WL 11550238, at \*1 (N.D. Tex. Oct. 12, 2021); Order, *ITW Bldg. Components Grp. v. Mann*, No. 3:15-cv-2121-N (N.D. Tex. July 13, 2015), ECF No. 13; *Brown v. Bridges*, No. 12-CV-4947-P, 2015 WL 11121361, at \*8 (N.D. Tex. Jan. 30, 2015); *Parental Guide of Texas, Inc. v. Samsung*, No. 701CV074-R, 2002 WL 1461933, at \*1 (N.D. Tex. July 3, 2002). In the interest of ensuring a timely resolution of these Motions, consistent with the discovery schedule currently being managed in the Southern District of New York, the Court should do the same here.

### **RELIEF SOUGHT**

Ms. Lively respectfully requests that the Court order that any response and brief in opposition to the Motion to Compel and the Motion to Transfer be filed by August 12, 2025.

---

<sup>1</sup>[https://www.nysd.uscourts.gov/sites/default/files/practice\\_documents/LJL%20Liman%20Individual%20Practices%20in%20Civil%20Cases\\_updated%204.7.2025.pdf](https://www.nysd.uscourts.gov/sites/default/files/practice_documents/LJL%20Liman%20Individual%20Practices%20in%20Civil%20Cases_updated%204.7.2025.pdf).

Respectfully submitted,

Dated: August 6, 2025

/s/ Samuel T. Mallick

Samuel T. Mallick  
Texas Bar No. 24109501  
Haynes and Boone, LLP  
2801 N Harwood St Suite 2300  
Dallas, TX 75201  
(214) 651-5962  
sam.mallick@haynesboone.com

Laura Lee Prather  
Texas Bar No. 16234200  
Michael J. Lambert  
Texas Bar No. 24128020  
Haynes and Boone, LLP  
98 San Jacinto Boulevard  
Suite 1500  
Austin, TX 78701  
(512) 867-8400  
laura.prather@haynesboone.com  
michael.lambert@haynesboone.com

Michael J. Gottlieb (*pro hac vice* forthcoming)  
New York Bar No. 4424149  
Kristin E. Bender (*pro hac vice* forthcoming)  
New York Bar No. 5513775  
Willkie Farr & Gallagher LLP  
1875 K Street NW  
Washington, DC 20006  
(202) 303-1000  
mgottlieb@willkie.com  
kbender@willkie.com

Aaron E. Nathan (*pro hac vice* forthcoming)  
Willkie Farr & Gallagher LLP  
New York Bar No. 5478227  
787 Seventh Avenue  
New York, NY 10019  
(212) 728-8904  
anathan@willkie.com

*Attorneys for Movant Blake Lively*

**CERTIFICATE OF CONFERENCE**

Counsel for Ms. Lively conferred with counsel for Respondents via email on August 5 and 6, 2025, and counsel for Respondents informed Ms. Lively that they oppose this motion.

Dated: August 6, 2025

/s/ Samuel T. Mallick

Samuel T. Mallick

*Attorney for Movant Blake Lively*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed via CM/ECF on August 6, 2025.

Notice of this filing and service will be sent in accordance with the Federal Rules of Civil Procedure.

Dated: August 6, 2025

/s/ Samuel T. Mallick  
Samuel T. Mallick  
*Attorney for Movant Blake Lively*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

BLAKE LIVELY,

Movant,

v.

THE SKYLINE AGENCY LLC and ROZA  
KALANTARI,

Respondents.

No. 3:25-mc-63-L

**[PROPOSED] ORDER**

Upon consideration of the motion by Blake Lively to shorten the time in which to file any response and brief in opposition to the Motion to Compel (Dkt. No. 1) and the Motion to Transfer (Dkt. No. 4), it is hereby ORDERED that:

1. The motion is **GRANTED**.
2. Any response and brief in opposition to the Motion to Compel or Motion to Transfer shall be filed by August 12, 2025.

**SO ORDERED.**

Signed on \_\_\_\_\_, 2025.

\_\_\_\_\_  
Hon. Sam A. Lindsay  
United States District Judge